

FILED  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CASEY MULLINS, et al.

\* 2003 FEB 24 P 3: 23

Plaintiffs

\*

vs.

\* ~~Civil Action No. L-02-CV-1634~~

BALTIMORE CITY, MARYLAND, et al.

\*

Defendants

\*

**CONSENT MOTION TO ALLOW AMENDED COMPLAINT – ADDITION OF TWO  
(2) DEFENDANTS AND MOTION FOR EXTENSION OF DISCOVERY  
DEADLINE/ISSUE NEW SCHEDULING ORDER**

The Plaintiffs, Casey Mullins and Jeremy Mullins, through counsel, H. Jeffrey Tabb, move this Honorable Court to grant an Order allowing the Amendment of the Complaint to add two (2) Defendants to this action and to (one last time) extend the discovery deadline/issue a new scheduling order; and for their cause state as follows:

1. This Court has previously extended the discovery deadline with the express purpose of allowing the Plaintiffs to identify the officers involved in the Plaintiffs' Complaint.
2. After taking five (5) depositions, the Plaintiffs are now able to identify two (2) police officers as having used physical force on the Plaintiffs as alleged in the Complaint.
3. The two officers identified are Officers Jan Rollon and Thomas Jugan.
4. Five (5) other officers were identified as working in the unit with Officers Rollon and Jugan, but the Plaintiffs were unable to serve them since their last names were too common, i.e., Officers Chambers, Carroll, Keller, Gills and Plaintiffs did not have their first names, badge numbers, etc.

GRANTED: Counsel shall confer and be  
March 10, 2003 submit a revised  
schedule. B. Legg 6/05

(18)

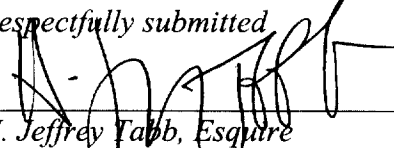
5. In the other five (5) depositions, these officers were identified by name and station and can now be served and deposed, and counsel for the Police Department, Arthur Fein, Esquire has been and is providing cooperation in the taking of these depositions and has advised counsel that he will call counsel to set a date for these depositions by February 22, 2003.

6. The prior depositions and the anticipated depositions have and will take place at 601 Fayette Street, Baltimore, Maryland, i.e., at the Police Department.

7. A copy of the proposed Amended Complaint is attached as **Exhibit #1**.

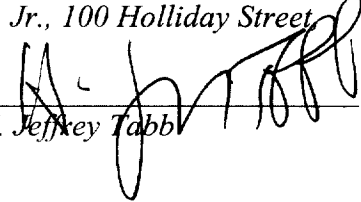
Wherefore, the Plaintiffs, Casey and Jeremy Mullins, respectfully request that this Honorable Court grant an Order allowing the Plaintiffs to Amend the Complaint to add as Defendants, Office Thomas Jugan and Officer Jan Rollon, and further request that this Honorable Court grant an Order extending the discovery deadline as it deems appropriate and to issue a new Scheduling Order, and for such further relief the Court deems appropriate.

Respectfully submitted

  
H. Jeffrey Tabb, Esquire  
8955-A Edmonston Road  
Greenbelt, Maryland 20770  
(301) 441-3636  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of February, 2003, a copy of the foregoing was mailed postage prepaid to: William R. Phelan, Jr., 100 Holliday Street, Baltimore, Maryland 21202.

  
H. Jeffrey Tabb